

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES LIABILITY)	
INSURANCE CO., INC., AS)	
INSURER OF ADMINASERVICE,)	
INC.)	
)	
Plaintiff,)	
)	CIVIL ACTION NO. 04-11824 PBS
v.)	
)	
ADVANTIUS, INC., NEAL)	
BERGSTROM, ROBERT)	
STEVENS, CHARLES CAMBRA,)	
III, JONATHAN K. DRIGGS, AND)	
WORKFORCE SOLUTIONS, INC.,)	
)	
Defendants.)	
_____)	

**RENEWED MOTION FOR JUDGMENT BY DEFAULT AGAINST
ROBERT STEVENS, NEAL BERGSTROM, AND ADVANTIUS, INC.**

Comes now, the plaintiff, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. and hereby prays that this Court enter defaults against the defendants Robert Stevens, Neal Bergstrom, and Advantius, Inc. pursuant to Fed.R.Civ.P. 55 (a) and 55(b)(1) for failure to plead or otherwise defend as required by Rules 12 and 14.

In support of this motion, the plaintiff states the following:

1. Robert Stevens was served individually on October 4, 2004 and his answer or response to the complaint was to be filed November 3, 2004. He has not filed an answer or other responsive pleading to date.
2. Neal Bergstrom was served on October 4, 2004 and he filed a motion to dismiss which was denied on December 16, 2004 and entered onto the docket on December 21, 2004. He has

not filed an answer to date.

3. Advantius, Inc. was served on April 28, 2005, and its answer or response to the complaint was to be filed May 18, 2005. It has not filed an answer or other responsive pleading to date.

WHEREFORE, United States Liability Insurance Co., Inc., as insurer of AdminaService, Inc. respectfully requests that the Court enter an order granting judgment by default against Robert Stevens, Neal Bergstrom, and Advantius, Inc. plus interest and costs, and any other relief this Court deems just and appropriate.

**UNITED STATES LIABILITY INSURANCE
COMPANY, as insurer of ADMINASERVICE,
INC.,**

By Its Attorney,

/s/ Amy Cashore Mariani

Amy Cashore Mariani, Esq.

BBO# 630160

FITZHUGH, PARKER & ALVARO, LLP

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Boston, MA 02110

(617) 695-2330

Dated: May 19, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to the below listed addresses via regular mail on May 19, 2006. The above document is being re-served on all parties of record, and was originally submitted to the Court care of Plaintiff's April 16, 2005, and May 31, 2005 filings.

Advantius, Inc.
c/o Utah Division of Corporations
160 E. 300 St
Salt Lake City, UT 84111

Neal Bergstrom
227 E. 7845 S
Sandy, UT 84070

Erik A. Olson
Durham Jones Pinegar, P.C.
111 East Broadway
Suite 900
Salt Lake City, UT 84111

Robert Stevens
3979 Dew Crest Cir
Holladay, UT 84124

/s/ Amy Cashore Mariani
Amy Cashore Mariani